

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 24, 2005

TO: Internal File

FROM: Karl R. Houskeeper Environmental Scientist III/Engineering, Team Lead

RE: Demolition of Buildings and Utilities, Sunnyside Cogeneration Association, Star Point Refuse, C/007/0042, Task ID #2333

SUMMARY:

The Division received an application requesting the demolition and removal of the existing buildings and utilities located within the Star Point Permit boundary. The request pertains to the structures and power poles; foundations will remain until final reclamation.

Recent theft and vandalism have prompted the request by the operator. Any materials not salvaged are to be disposed of in the designated locations according to permit requirements. Bond release for structure removal has not been requested. The current bond will remain in place. This memo will address the administrative and engineering sections of the application.

TECHNICAL ANALYSIS:

GENERAL CONTENTS

IDENTIFICATION OF INTERESTS

Regulatory Reference: 30 CFR 773.22; 30 CFR 778.13; R645-301-112

Analysis:

The resident agent for Sunnyside Cogeneration Associates, Star Point Waste Fuel changed in 2005 from Randy J. Scott to Michael J. Blakey. This change was accomplished by the review and approval by the Division of Task ID #2252. The remaining corporate structure was checked against the information contained in the Office of Surface Mining (OSM) Applicant Violator System (AVS) and found to be up to date.

TECHNICAL MEMO

Findings

Information contained in this section of the application meets the minimum requirements.

VIOLATION INFORMATION

Regulatory Reference: 30 CFR 773.15(b); 30 CFR 773.23; 30 CFR 778.14; R645-300-132; R645-301-113

Analysis:

The application updated the violation information section of the Mining and Reclamation Plan (MRP) with the addition of NOV No. N04-49-3-1. The abatement for this violation has been met and penalties have been paid.

Findings

Information contained in this section of the application meets the minimum requirements.

OPERATION PLAN

EXISTING STRUCTURES:

Regulatory Reference: 30 CFR 784.12; R645-301-526.

Analysis:

Table 526.111a has been revised to show the existing structures remaining after demolition will be foundations and not buildings.

Findings

Information contained in this section of the application meets the minimum requirements.

SUPPORT FACILITIES AND UTILITY INSTALLATIONS

Regulatory Reference: 30 CFR Sec. 784.30, 817.180, 817.181; R645-301-526.

Analysis:

The proposed demolition of buildings and removal of inactive power poles are reflected of the maps contained in the application. This information is also reflected in the text under section 526.

Findings:

Information contained in this section of the application meets the minimum requirements.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Mining Facilities Maps

Maps 521.100d, 534.100b, 521.100f, 521.100a, have been revised to reflect the proposed demolition of buildings and unused utility power poles. Maps 521.100k and 521.100l have been added to show the existing facilities and surface configuration in 2005 when the demolition took place.

Certification Requirements

The maps referenced above will require certification upon completion of demolition and when the maps are put together to reflect current conditions.

Findings:

Information contained in this section of the application meets the minimum requirements.

RECOMMENDATIONS:

It is recommended that this amendment be approved upon completion of demolition and submission of as-built maps that are P.E. certified.